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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CIRILO UCHARIMA ALVARADO, on behalf of himself and all others similarly situated;

V.

WESTERN RANGE ASSOCIATION, a California non-profit corporation; **ELLISONz RANCHING COMPANY**, a Nevada corporation; **JOHN ESPIL SHEEP CO., INC.**, a Nevada corporation; **F.I.M. CORP.**, a Nevada corporation; **THE LITTLE PARIS SHEEP COMPANY, LLC**, a Nevada limited liability company; **BORDA LAND & SHEEP COMPANY, LLC**, a

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Attorneys for Defendant Western Range Association

Case No. 3:22-cv-00249-MMD-CLB

**ORDER GRANTING JOINT
MOTION TO EXTEND TIME FOR
PLAINTIFF TO FILE AMENDED
COMPLAINT**

1 Nevada limited liability company; **HOLLAND**
 2 **RANCH, LLC**, a Nevada limited liability
 3 company; **NEED MORE SHEEP CO., LLC**, a
 4 Nevada limited liability company; and
FAULKNER LAND AND LIVESTOCK
COMPANY, INC., an Idaho corporation,

5 *Defendants.*

6

7 Plaintiff Cirilo Ucharima Alvarado (“Plaintiff”) and Defendant Western Range
 8 Association (“WRA”), by and through their respective counsel, respectfully submit this joint
 9 motion asking the Court to extend the deadline for Plaintiff to file his amended complaint by two
 10 weeks, until September 27, 2024.¹

11

12 The Parties submit that the extension is warranted due to WRA’s discovery on September
 13 10, 2024—less than three days before Plaintiff’s current deadline of September 13, 2024 to
 14 amend his complaint—that it had inadvertently failed to produce 117,903 pages of documents
 15 from its custodial ESI production. *See Declaration of Yaman Salahi (“Salahi Decl.”) ¶ 4.* The
 16 Court previously ordered WRA to complete its ESI production by August 30, 2024, and on
 17 August 27, 2024, WRA produced 300,678 pages. *Id.* at ¶ 3. This means that over a quarter of
 18 the ESI materials were inadvertently not produced until September 10, 2024. WRA promptly
 19 corrected its oversight by making these materials available to Plaintiff on the evening of
 20 September 10. *Id.* at ¶ 4. Nevertheless, the Parties agree that the short amount of time between
 21 WRA’s production and Plaintiff’s deadline to amend does not afford Plaintiff an opportunity to
 22 meaningfully review these materials for purposes of inclusion in the amended complaint. *Id.* at
 23 ¶ 5.

24 For the foregoing reasons, Plaintiff and WRA respectfully request the Court extend by

25

26 ¹ Plaintiff requested the Ranch Defendants’ position on this motion before filing. The
 27 Ranch Defendants stated that they “preserve their previous objections as stated in ECF 188, 191,
 199, and n.1 to 210.” As Plaintiff has previously stated, he does not intend to seek additional
 discovery from the Ranch Defendants prior to filing an amended complaint.

1 two weeks Plaintiff's deadline to file an amended complaint, until September 27, 2024. This is
2 the second joint request by Plaintiff and WRA for an extension of time to extend deadlines since
3 the Court's July 19, 2024 order and Plaintiff's fifth request to extend the deadline to amend his
4 complaint, all previous extensions of which were granted due to the pace of discovery
5 production. The parties do not expect that additional extensions will be needed for the amended
6 complaint.

7 Dated: September 11, 2024

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25 Dated: September 11, 2024

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16 *Attorneys for Defendant Western Range
17 Association*

18
19 **IT IS SO ORDERED.**

20 **Dated:** September 11, 2024

21
22 **ORDER**

23
24 
25 **UNITED STATES MAGISTRATE JUDGE**